



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
RICHFIELD FIELD OFFICE
150 East 900 North
Richfield, UT 84701



IN REPLY REFER TO:
3809
(U-050)

December 14, 2000

Mr. Richard Hope, Manufacturing Manager
Georgia-Pacific Corporation
200 South State Street
Sigurd, Utah 84657

Dear Mr. Hope:

On October 25, 2000, Russell Harms of Georgia-Pacific Corporation met with Lynn Kunzler of Utah Division of Oil, Gas, and Mining and Michael Jackson of the Bureau of Land Management in the Richfield Field Office to review the existing case file with respect to the Sigurd operations. A summary of the discussion with respect to the 1981 Plan of Operations and subsequent plan modifications is enclosed for your review.

We understand that Georgia-Pacific is reviewing the Plans of Operations, mapping existing disturbances and reclaimed areas, and assessing areas to be mined or disturbed for future operations. Based on that review, Georgia-Pacific will submit a plan modification, as needed; however, we agreed that the first step would be to develop a suitable map or maps portraying the past, present, and future mining areas and associated facilities such as access roads and haul ramps. Also, as discussed, the bonding agreement will need to be reviewed, and the BLM will need co-signing authority on any bonding instrument.

As you may be aware, since the meeting in October, new federal regulations under 43 CFR §3809 have been finalized and will be effective on January 20, 2001. You may want to review the new regulations, specifically §3809.434, to ascertain the requirements that will apply to any modification that you may submit to this office.

If you have any questions, please contact Michael Jackson at (435) 896-1522.

Sincerely,

Dave Henderson
Associate Field Manager

cc: Russell Harms, Environmental Engineer, Georgia-Pacific Corporation, P. O. Box 337350, North Las Vegas, NV 89033-0040

Lynn Kunzler, Division of Oil, Gas and Mining, State of Utah, Box 145801, Salt Lake City, Utah 84114-5801

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DIVISION OF
OIL, GAS AND MINING

MEETING CONFIRMATION

CASE FILE: UTU-71500
OPERATOR: Georgia-Pacific Corporation
PROJECT AREA: Sigurd Operations
DATE of MEETING: October 25, 2000
REPORTED BY: Michael K. Jackson, Geologist
DATE of REPORT: October 26, 2000

On the above date, I met with Russ Harms, Georgia-Pacific Corporation, and Lynn Kunzler, UDOGM, to discuss the mining and reclamation plan for operations in the vicinity of Sigurd, Utah. This meeting was a follow-up to the inspection in June 2000, and Mr. Harms had also met with me on October 17, 2000, to obtain copies of the plans, correspondence, and other significant documents in the BLM file.

On this date, we summarily reviewed the case file. Matters discussed included:

1. BLM approved a Plan of Operations in 1981, which is a copy of the 1977 UDOGM Mining and Reclamation Plan (MRP). At least some maps that are part of this plan are in the case file.
2. A copy of a subsequent, updated MRP in 1987 has not been approved by BLM, but a copy of the text is on file with the BLM records. Maps that may have been part of this plan are not in the case file.
3. A Self-Bond Agreement that was part of the 1987 MRP update is also in the case file, but BLM is not party to the bond.
4. Mr. Harms is working to update the MRP to the present. For now, Mr. Harms is in the process mapping disturbances that presently exist at the mining property by using GPS. These disturbances will need to be identified as to pre-1975, 1975 to 1981, and 1981 and later. Those dates are important as to regulatory requirements by the State of Utah and the federal surface management regulations at §3809. Mr. Harms will also be identifying proposed mining areas and projecting dates for mining at those areas. Land status as to patented mining claims (private land) and unpatented mining claims will also need to be identified for each mining area—past, present, and future. Some of this information is provided in the maps previously submitted to UDOGM and/or BLM. Temporal and spatial sequencing of reclaiming existing disturbed areas, opening of proposed mining areas, and reclaiming the proposed areas, plus the acreage associated with each mining site, will be needed for the bond calculation. Under the 1987 updated MRP, areas disturbed between 1975 to 1987 were to be reclaimed within five years of 1987, and areas disturbed after 1987 were to be reclaimed within one year of completing the mining operations.
5. In some of the presently disturbed quarries, GP, UDOGM, and BLM may need to

conduct an on-site inspection to determine the feasibility of reclaiming dump slopes.

6. Cross-section and engineering designs of quarry operations and roads will be needed in the update.
7. The last Annual Report was submitted to UDOGM for 1990. BLM has not been receiving any annual reports and a copy should be forwarded to this office. Partial copies (black and white) of the 1990 colored maps, showing land status and past, present (1990) and future mining were made for BLM and GP.
8. Access and haul roads used for the mining operations need to be identified. The main haul road from the Sigurd plants to the northern mining areas appears to be a pre-1975 road. Some discussion was held as to the responsibility for that road—GP or US Gypsum. It crosses federal and patented land. BLM sent a letter to US Gypsum in 1992 stating that the road is covered under GP's plan.
9. Mining claims that are to be mined or otherwise disturbed for mining or milling related operations need to be specifically identified, not a list of the affected claims for assessment work purposes. Equipment storage, buildings, etc., if any, that would be an occupancy on federal land need to be addressed in the plan. Signs warning the public of mining operations and hazards need to be approved by BLM, if on federal land.
10. Areas for stockpiling topsoil need to be addressed in the plan and specifically identified on maps. Such stockpiles need to be signed on the ground. To date, no test plots have been designed and the need for such testing is undetermined at this time. I am uncertain that the present plans address the depth of topsoil to be stripped and the thickness for re-application of topsoil. The topsoil is alkaline.
11. BLM will need to review the NEPA compliance record, when a draft plan is submitted. An Environmental Assessment was prepared in 1981, and the adequacy of that document will need to be ascertained, when the modified plan is submitted to this office.
12. BLM will need to have an acceptable bond under the federal regulations with co-signing authority by BLM.
13. The goal is to update the plan by the time of the annual report in January 2001.

Michael K. Jackson